

**FIG. 1**

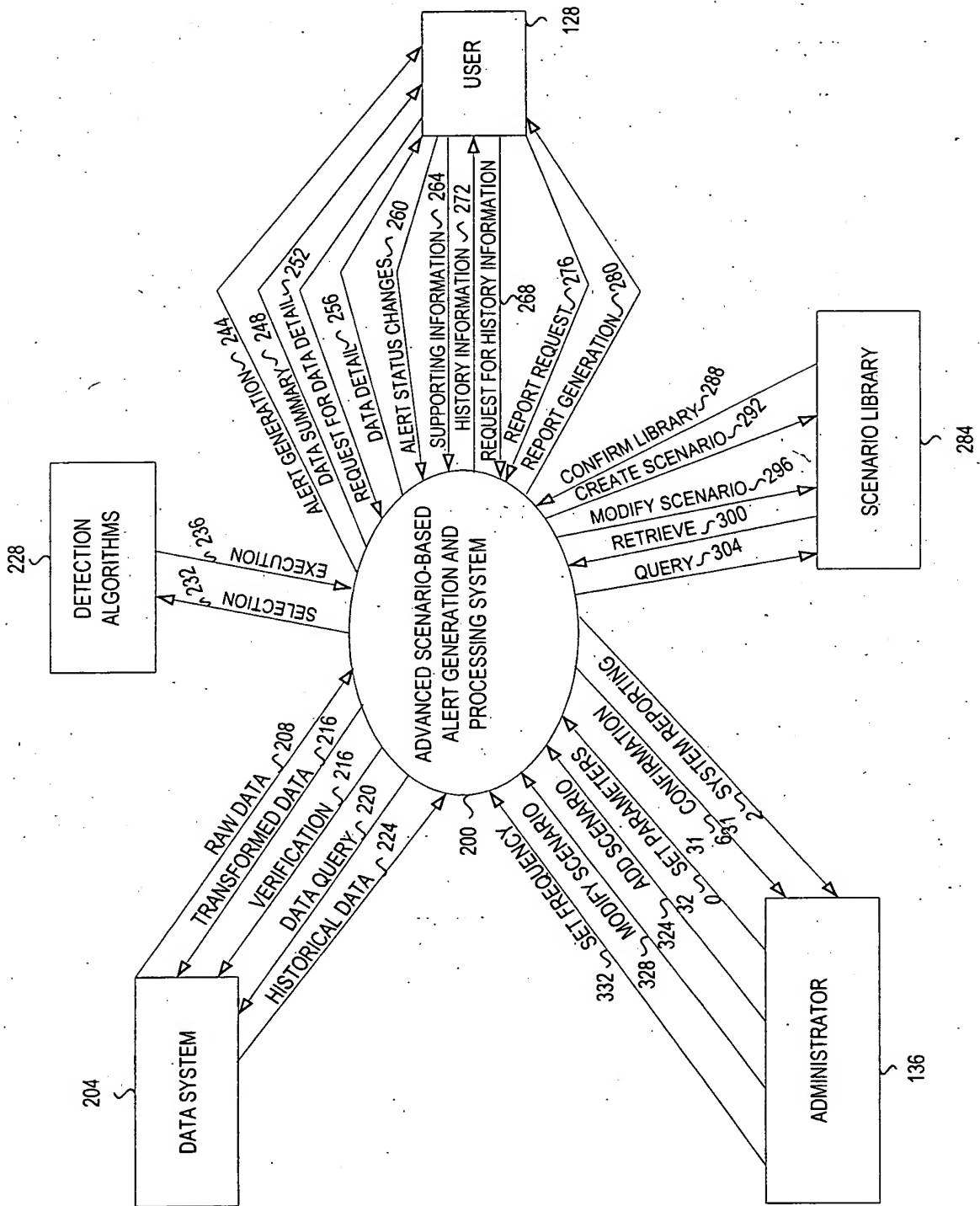


FIG. 2

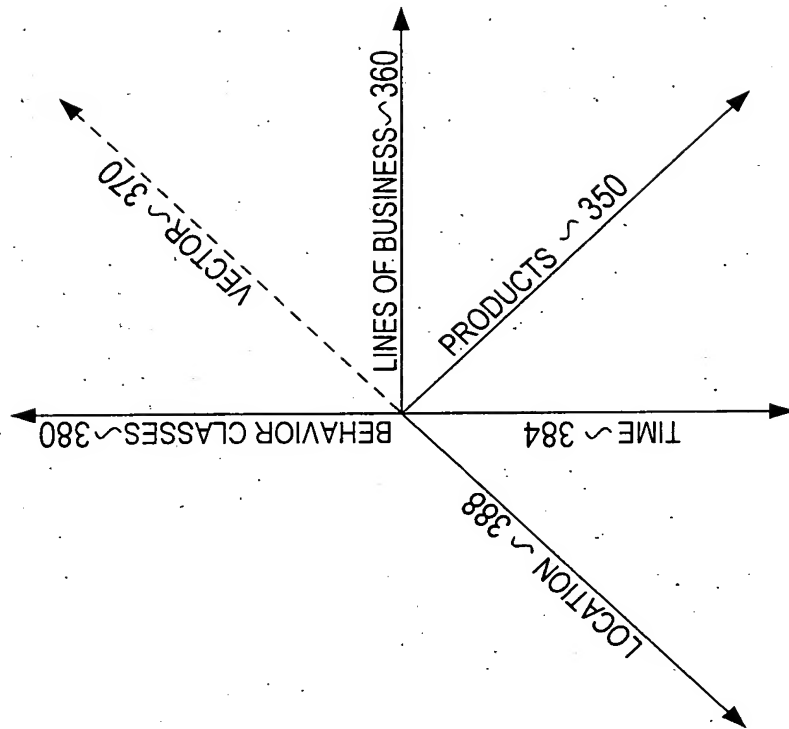


FIG. 3

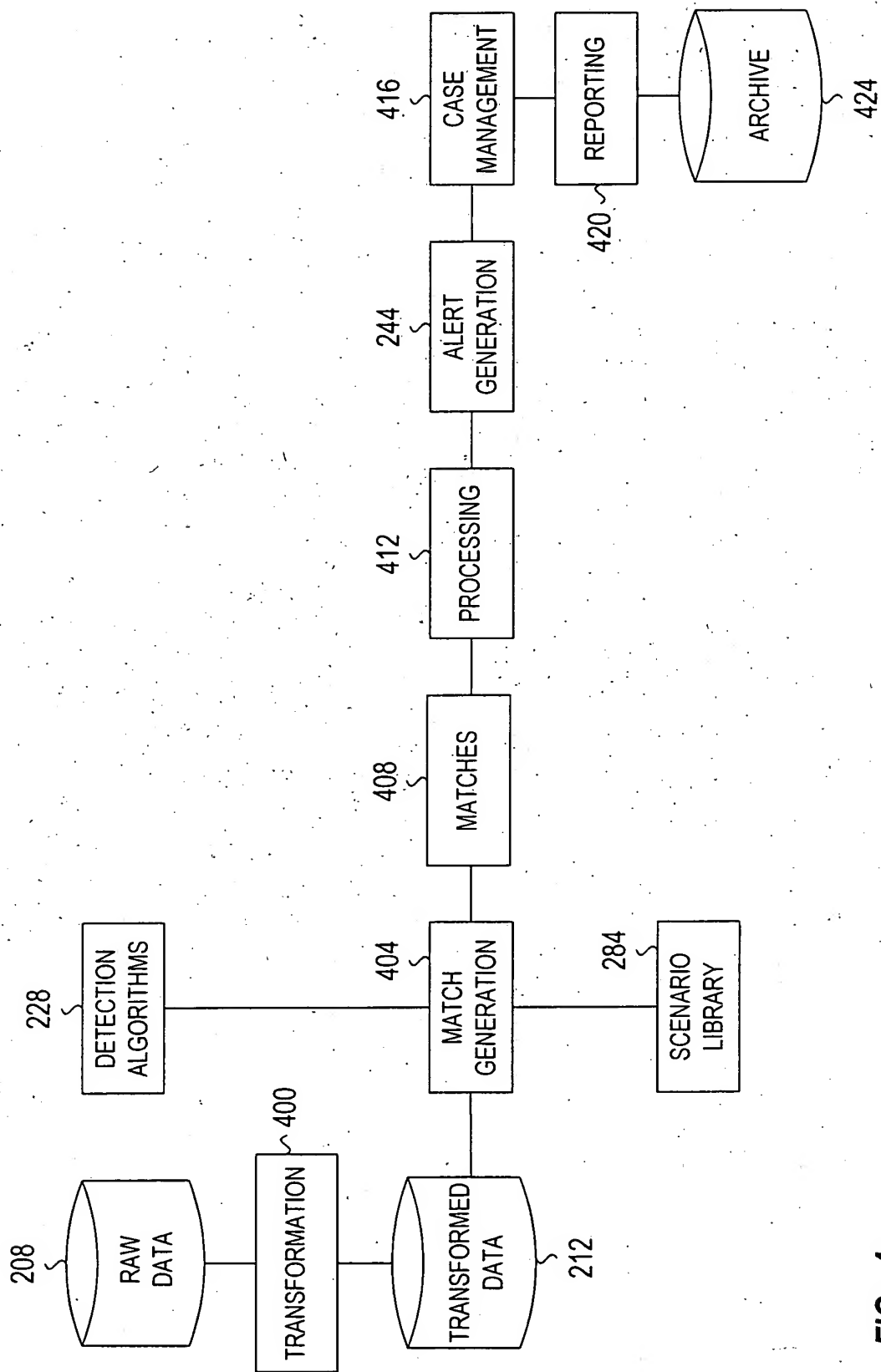


FIG. 4

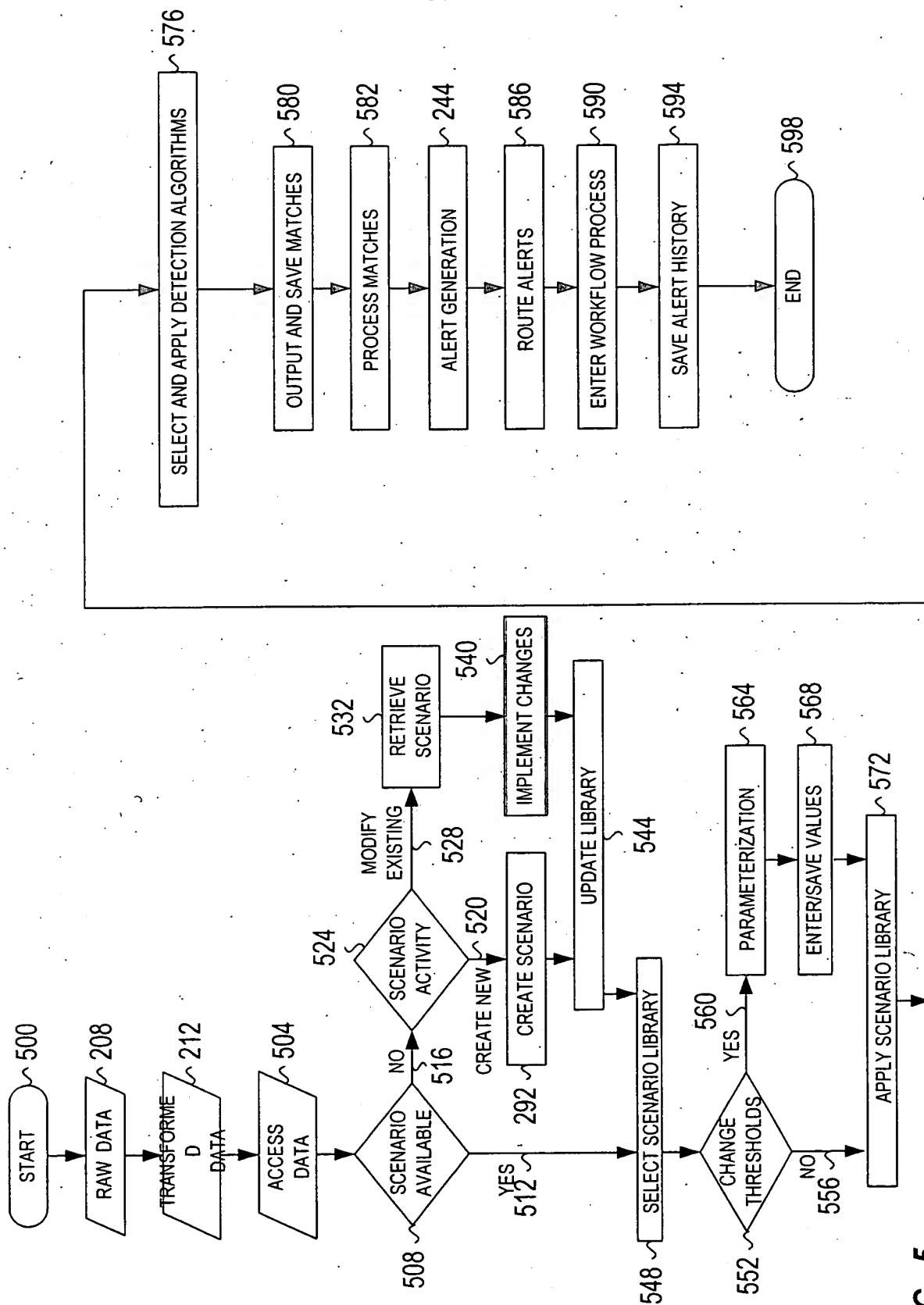


FIG. 5

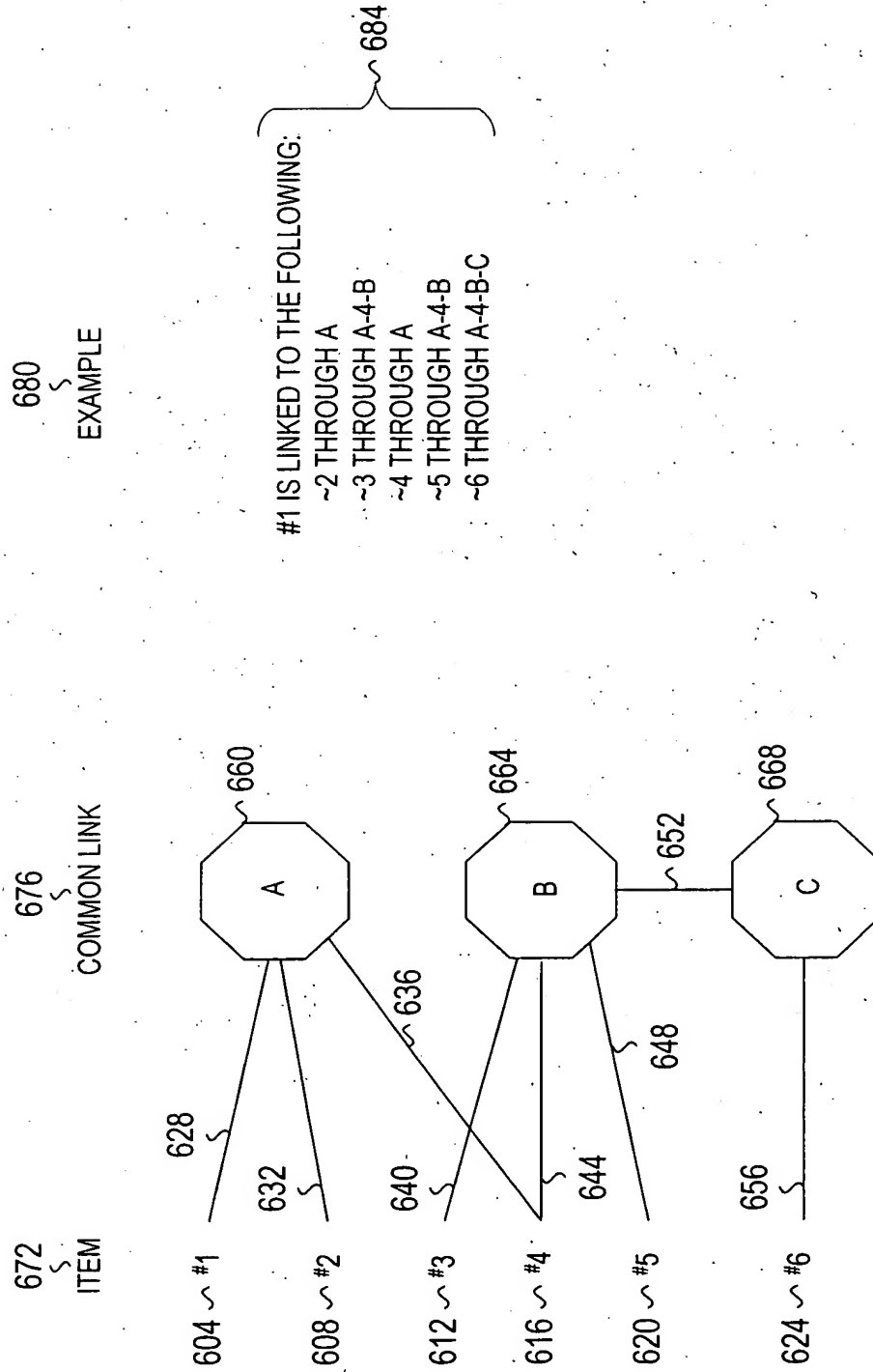


FIG. 6

+

700 ~ EXAMPLE #1:

704 ~ EXAMPLE #2:

708. ~ EXAMPLE #3:

+

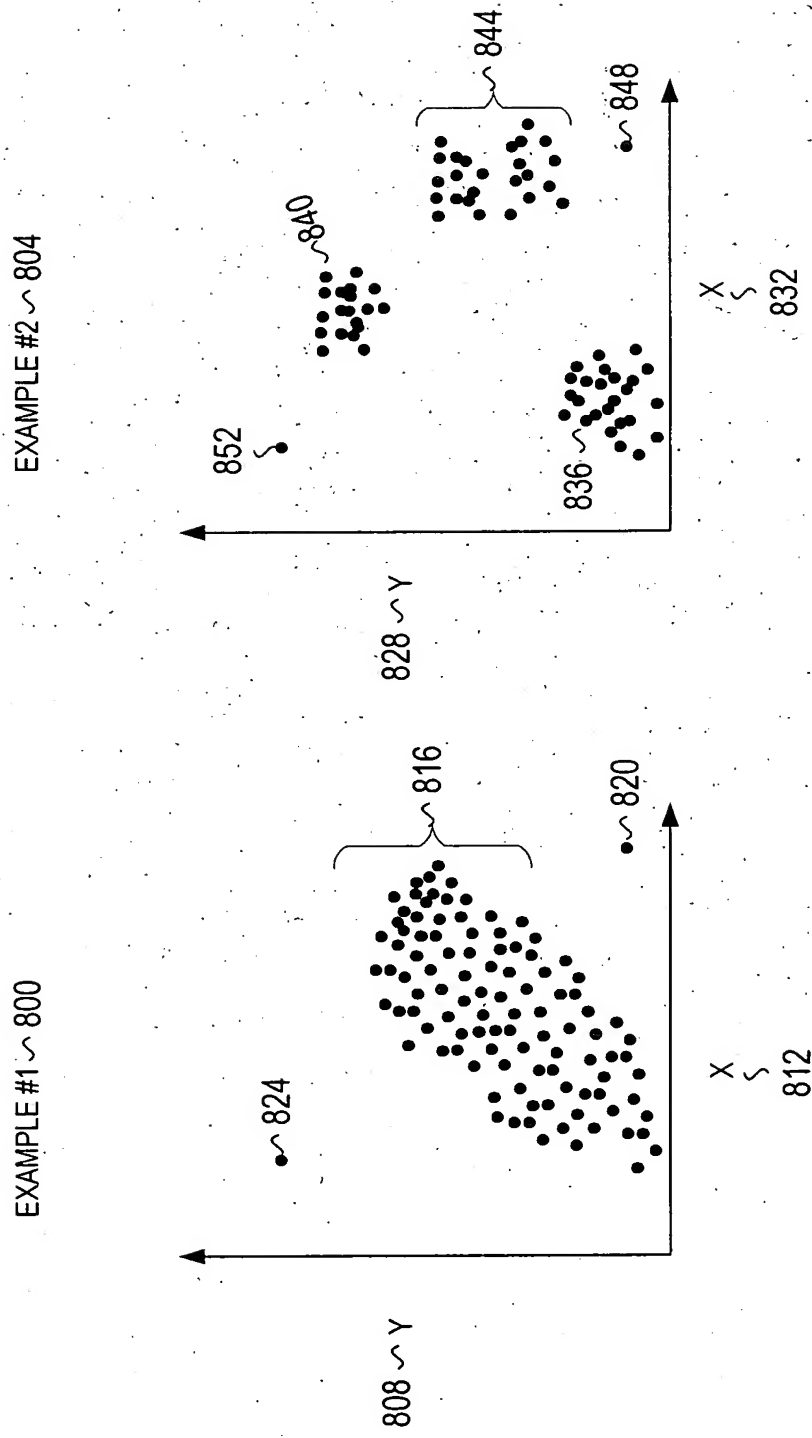


FIG. 8



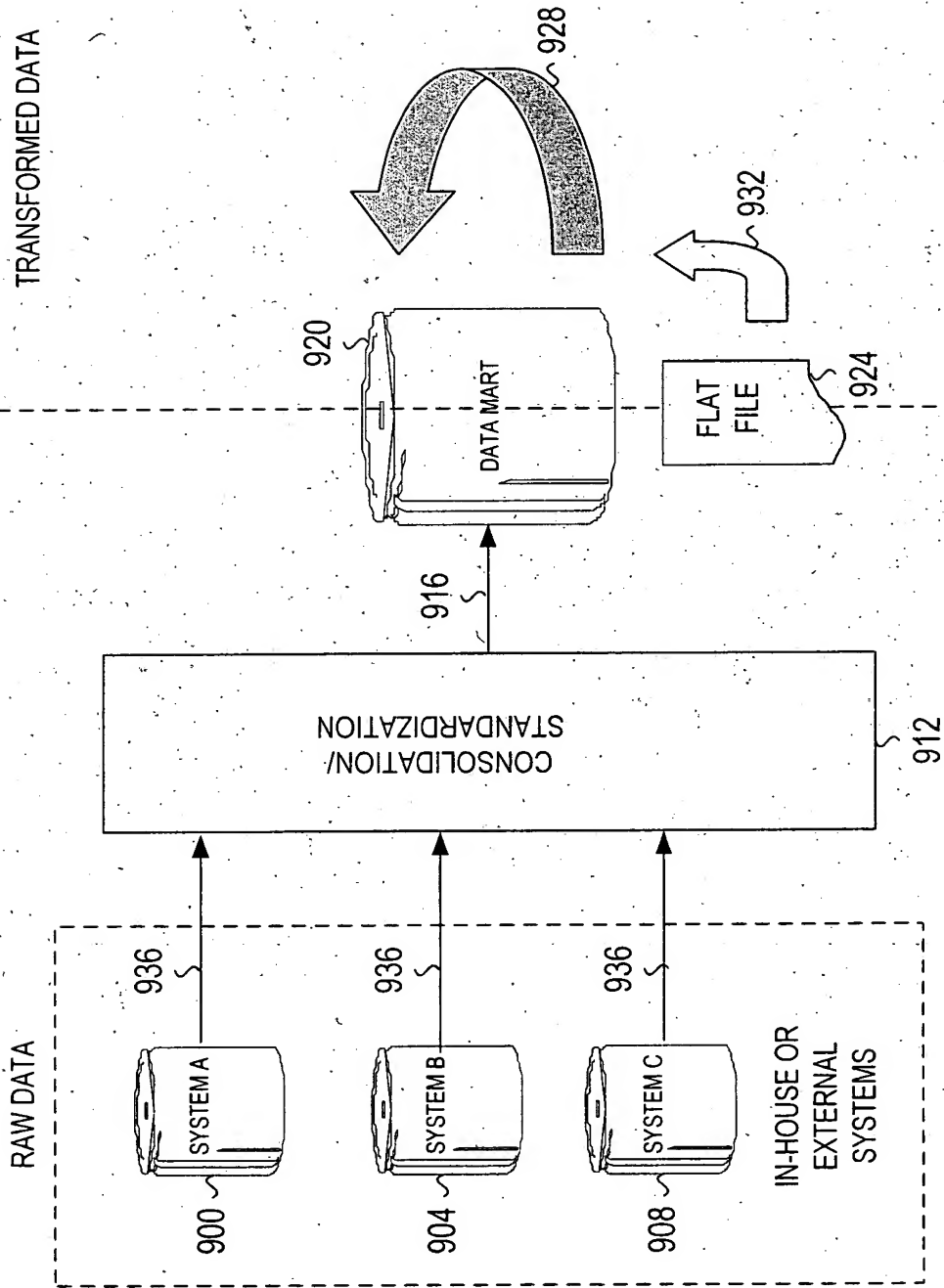


FIG. 9A

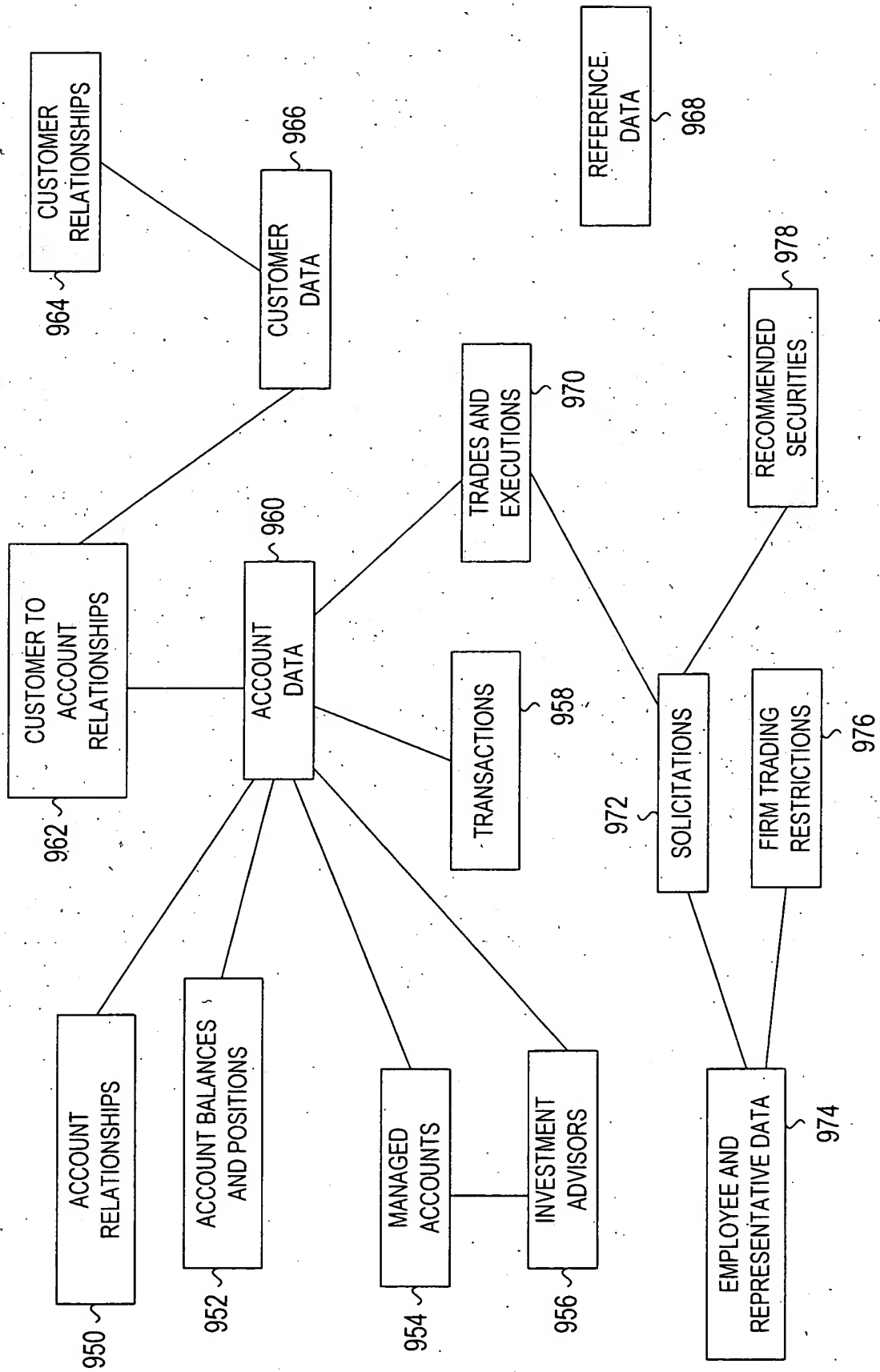
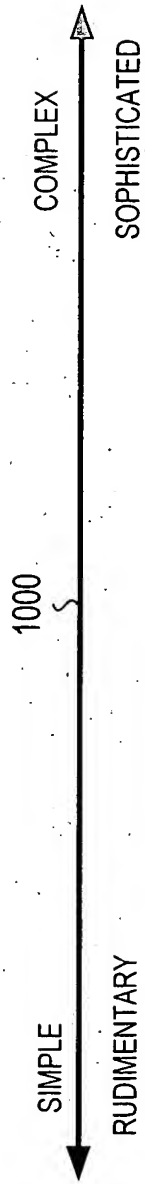


FIG. 9B



1004



1008



1012

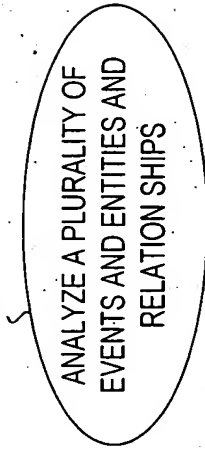


FIG. 10

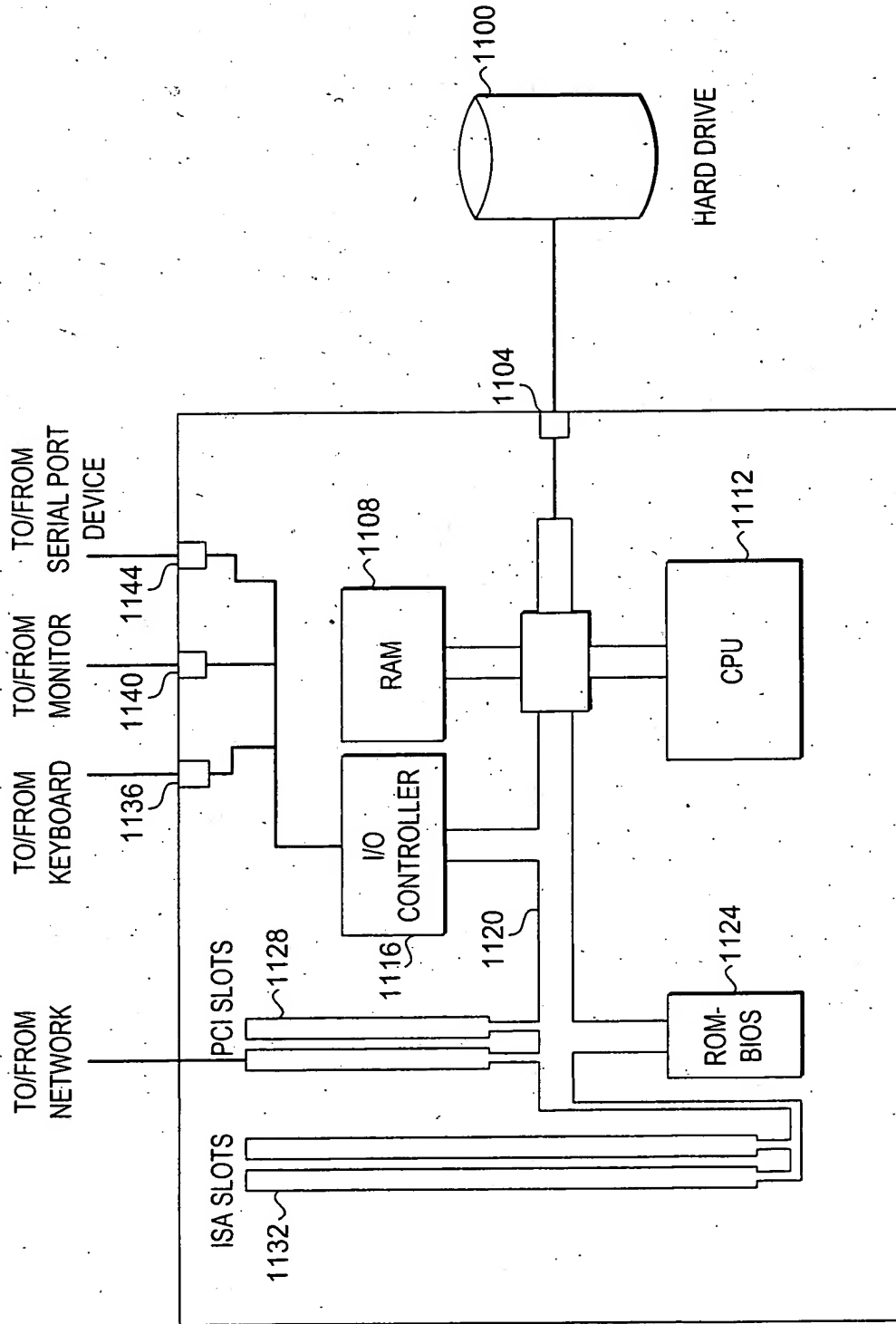


FIG. 11

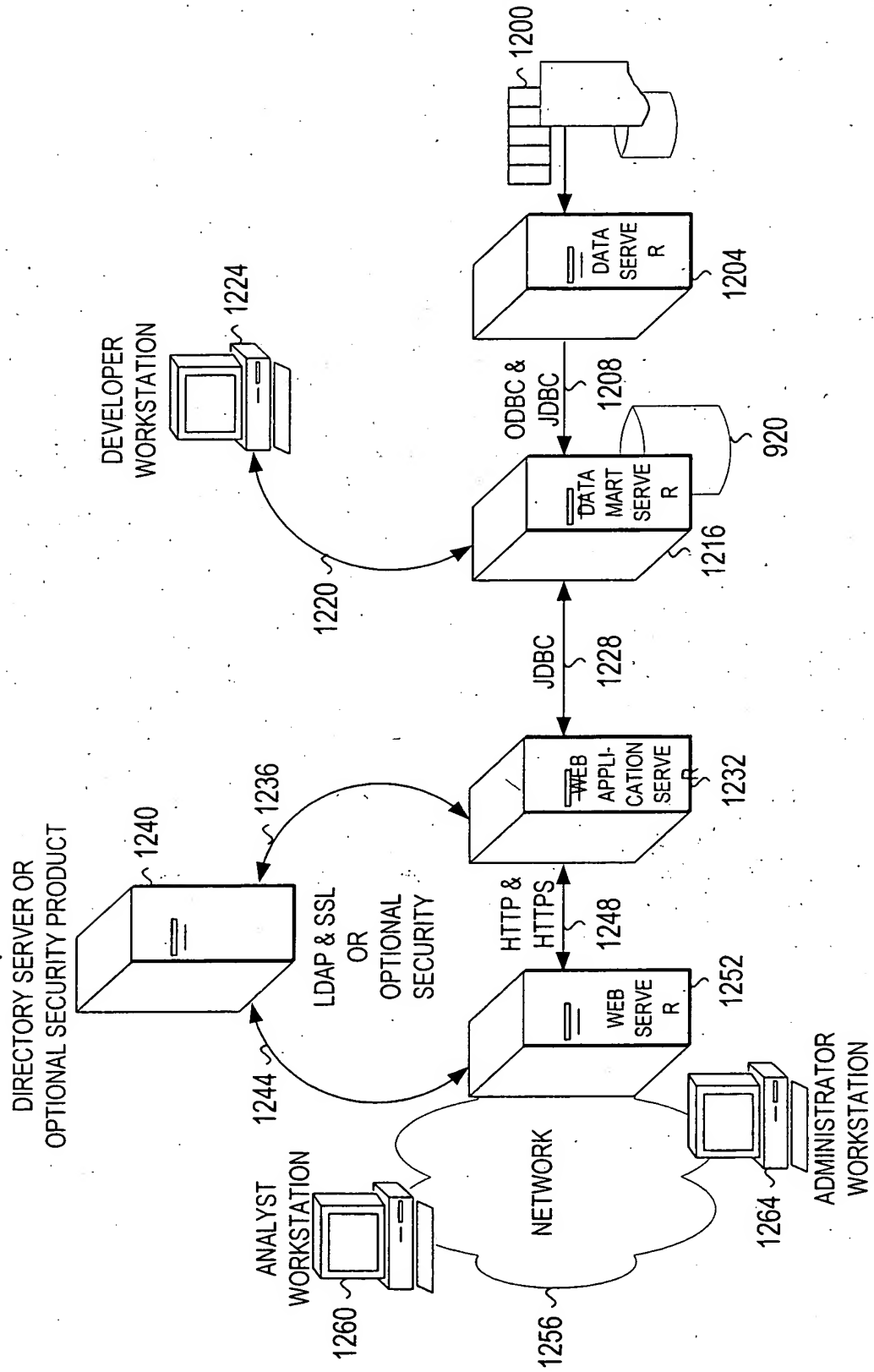
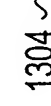


FIG. 12

1300 ~~~~~
$$+$$

Threshold Definer

Name	Display Name	Description	Units	Data Type
CONST_BindTrnBC	ChkMIPbn.BndTrn	The flag to indicate whether to bind the transaction records for the <NO_UNIT>	<NO_UNIT>	INTEGER
CONST_MinTAmBPH	ChkMIPbnHR.MinAm	The min total trans amount (checking and M.L. products) for the bet MONEY	MONEY	REAL
CONST_MinTxCBPH	ChkMIPbnHR.MinCl	The min total trans count (checking and M.L. products) for the bet <NO_UNIT>	<NO_UNIT>	INTEGER
CONST_MinTAmBPM	ChkMIPbnMR.MinAm	The min total trans amount (checking and M.L. products) for the bet MONEY	MONEY	REAL
CONST_MinTxCBPM	ChkMIPbnMR.MinCl	The min total trans count (checking and M.L. products) for the bet <NO_UNIT>	<NO_UNIT>	INTEGER
CONST_MinTAmBPR	ChkMIPbnRR.MinAm	The min total trans amount (checking and M.L. products) for the bet MONEY	MONEY	REAL
CONST_MinTxCBPR	ChkMIPbnRR.MinCl	The min total trans count (checking and M.L. products) for the bet <NO_UNIT>	<NO_UNIT>	INTEGER
CONST_BndTrnRC	ChkMIPRem.BndTrn	The flag to indicate whether to bind the transaction records for the <NO_UNIT>	<NO_UNIT>	INTEGER
CONST_MinTAmRPH	ChkMIPRemHR.MinAm	The min total trans amount (checking and M.L. products) for the bet MONEY	MONEY	REAL
CONST_MinTxCBPH	ChkMIPRemHR.MinCl	The min total trans count (checking and M.L. products) for the bet <NO_UNIT>	<NO_UNIT>	INTEGER
CONST_MinTAmRPM	ChkMIPRemMR.MinAm	The min total trans amount (checking and M.L. products) for the bet MONEY	MONEY	REAL
CONST_MinTxCBPM	ChkMIPRemMR.MinCl	The min total trans count (checking and M.L. products) for the bet <NO_UNIT>	<NO_UNIT>	INTEGER
CONST_MinTAmRPR	ChkMIPRemRR.MinAm	The min total trans amount (checking and M.L. products) for the bet MONEY	MONEY	REAL
CONST_MinTxCBPR	ChkMIPRemRR.MinCl	The min total trans count (checking and M.L. products) for the bet <NO_UNIT>	<NO_UNIT>	INTEGER
CONST_ChkPbnBPH	ChkPbnHR.MinAm	The min abs % trans amount change of the most recent month for PERCENTAGE	PERCENTAGE	REAL
CONST_ChkSdBPH	ChkPbnHR.MinCl	The min # of standard deviations from the average trans amount for <NO_UNIT>	<NO_UNIT>	INTEGER
CONST_FrcChkPbnBPH	ChkPbnHR.AvgPbnCho	The min abs % trans amount change of the most recent month for PERCENTAGE	PERCENTAGE	REAL
CONST_FrcChkSdBPH	ChkPbnHR.AvgSd	The min # of standard deviations from the average foreign trans amount for <NO_UNIT>	<NO_UNIT>	INTEGER
CONST_HrcChkPbnBPH	ChkPbnHR.HrcPbnCho	The min abs % HRC trans amount change of the most recent month for PERCENTAGE	PERCENTAGE	REAL
CONST_HrcChkSdBPH	ChkPbnHR.HrcSd	The min # of standard deviations from the average HRC trans amount for <NO_UNIT>	<NO_UNIT>	INTEGER
CONST_ChkPbnBPM	ChkPbnMR.MinAm	The min abs % trans amount change of the most recent month for PERCENTAGE	PERCENTAGE	REAL
CONST_ChkSdBPM	ChkPbnMR.MinCl	The min # of standard deviations from the average trans amount for <NO_UNIT>	<NO_UNIT>	INTEGER
CONST_FrcChkPbnBPM	ChkPbnMR.AvgPbnCho	The min abs % foreign trans amount change of the most recent month for PERCENTAGE	PERCENTAGE	REAL
CONST_FrcChkSdBPM	ChkPbnMR.AvgSd	The min # of standard deviations from the average foreign trans amount for <NO_UNIT>	<NO_UNIT>	INTEGER
CONST_HrcChkPbnBPM	ChkPbnMR.HrcPbnCho	The min abs % HRC trans amount change of the most recent month for PERCENTAGE	PERCENTAGE	REAL
CONST_HrcChkSdBPM	ChkPbnMR.HrcSd	The min # of standard deviations from the average HRC trans amount for <NO_UNIT>	<NO_UNIT>	INTEGER

<NO\_NAME>

ChkPbnMR.HrcPbnCho

10

10

100

5

REAL

PERCENTAGE

Add

Change

Delete

Ok

Cancel

Description

The min abs % HRC trans amount change of the most recent month from the

FIG. 14

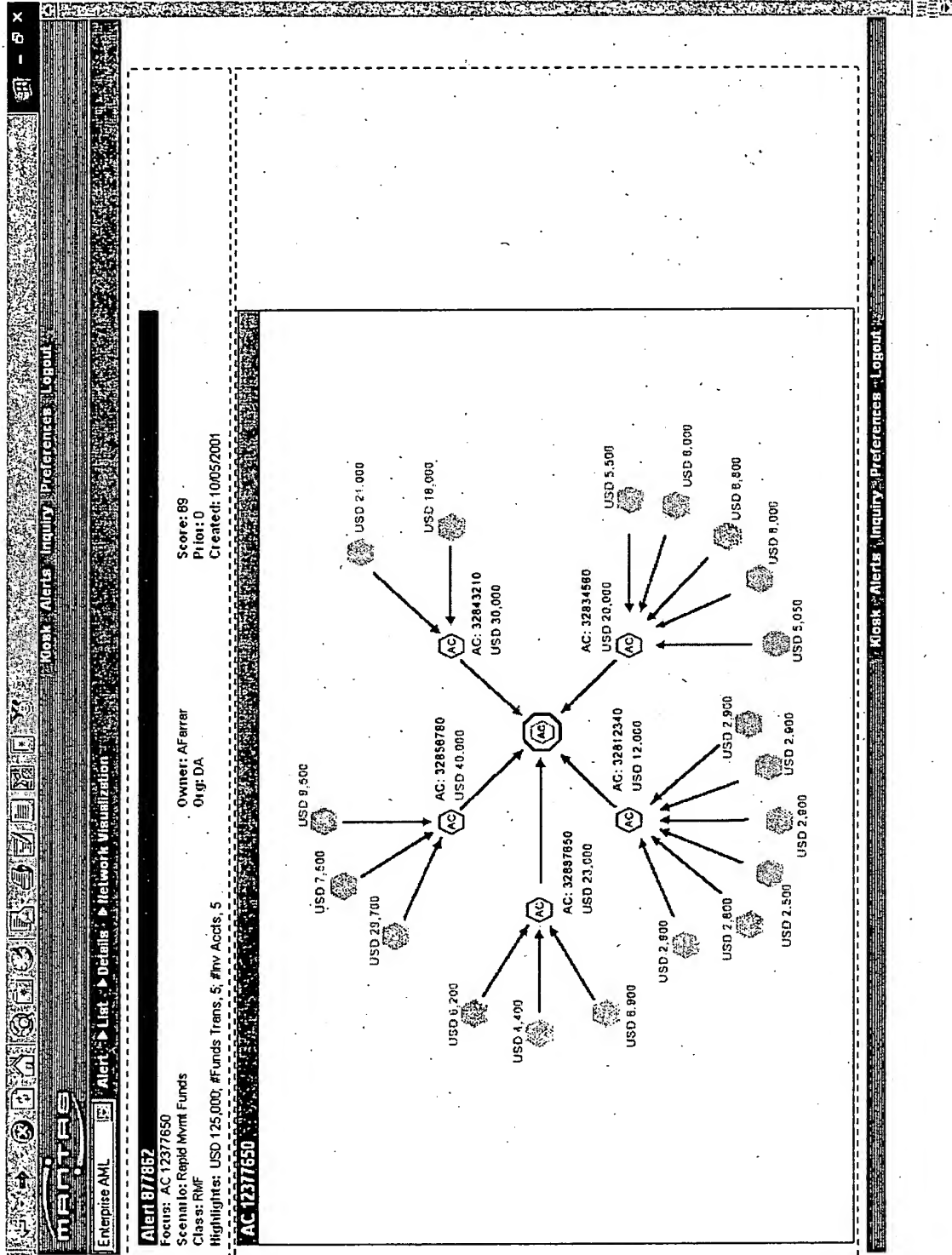


FIG. 15



To change the alerts displayed, use the controls below.

Filter by:

Orig:

Scenario Class:

Score:

Score (SC):

View:

or Owner:

or Scenario:

Status:

Class (CL):

20 Alerts

Age:

Prior

Owner

Age

C Status

20 Alerts

50 Alerts

200 Alerts

Help

Details

Review the alerts below. For detailed information about an alert, click the details button.

Alert List

Page: 1 of 3

Displayed: 1 - 10 of 26 Alerts

Alert ID	Alert Title	Alert Description	Alert Status	Alert Date	Alert Time	Alert User	Alert Action
1600	SC: JSC: 99 CB Merchant B...	USD 25,200, #Items, 36, #Purchases, 1, #Accts, 1	Open	1620			
1601	95 AD 312 New Jersey Ave	M - Recur Address	Open	1624			
1602	95 AC 1234567-001	CB Change - Funds	Open	1628			
1603	94 JET Nordic Travel	ICRIT Funds Trans - Recur CR/BE	Open				
1604	92 JAC 1144781036	HRQ:HRQ - Funds Trans	Open				
1605	91 JCU Charles Smythe, ...	HRQ: Funds Trans - CUEB	Open				
1606	89 JAC 12377650	Multiple Matches	Open				
1607	86 JAC 22213450	OWB: Multiple Matches	Open				
1608	82 JCU Michael Mackey	IRME: IR Rapid Mgmt Funds	Open				
1609	80 JET Haind Ent., Ltd.	ICRIT Opening - Mut Chrg	Open				
1610			Open				
1611			Open				
1612			Open				
1613			Open				
1614			Open				
1615			Open				
1616			Open				
1617			Open				
1618			Open				
1619			Open				
1620			Open				
1621			Open				
1622			Open				
1623			Open				
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1629			Open				
1630			Open				
1631			Open				
1632			Open				
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1648			Open				
1649			Open				
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1655			Open				
1656			Open				
1657			Open				
1658			Open				
1659			Open				
1660			Open				

FIG. 16

Enterprise AML - Alert Details - Microsoft Internet Explorer											
File	Edit	View	Favorites	Tools	Help	Back	Forward	Stop	Refresh		
Home	Search	Favorites	History	Print	Mail	Edit	Discuss				
					Links						
<b>MANTAS</b>											
Enterprise AML Alerts List Details											
Details Client Bank Summary Transactions History Actions											
Status: OPEN Help											
<p>Focus: CB Manufacturers Merchant Bank            Scenario: MI- Sequential No.            Class: OMB            Highlights: USD 25,200; #Items: 36; #Pouches: 1; #ACcts: 1</p> <p>Owner: WA044207            Org: CLR            Score: 99            Prior: 3            Created: 10/08/2001</p>											
Client Bank ID Name Type Bus Unit Watchlist Location											
036986035 Manufacturers Merchant Bank FICMI -- 15 Trinidad Terrace, Kingston 5, JM											
Cash Products, Check Transactions											
Post Date	Group ID	Src	Type	Serial/Check #	Amount	Remitter Name	Acct No	Beneficiary Name	Acct No	3P/ PT	Frn Chk
10/05/2001	086121234567	CLR	PMO	0161781053	USD 700	Antoinette Fuller	--	Samuel Birch	36176008	N	N
10/05/2001	086121234567	CLR	PMO	0161781054	USD 700	Antoinette Fuller	--	Samuel Birch	36176008	N	N
10/05/2001	086121234567	CLR	PMO	0161781055	USD 700	Nicola Reid	--	Samuel Birch	36176008	N	N
10/05/2001	086121234567	CLR	PMO	0161781056	USD 700	Sophia Shepard	--	Samuel Birch	36176008	N	N
10/05/2001	086121234567	CLR	PMO	0218171820	USD 700	Vernita Sewell	--	Samuel Birch	36176008	N	N
10/05/2001	086121234567	CLR	PMO	0218171821	USD 700	Sophia Shepard	--	Samuel Birch	36176008	N	N
10/05/2001	086121234567	CLR	PMO	0218171822	USD 700	Sophia Shepard	--	Samuel Birch	36176008	N	N
10/05/2001	086121234567	CLR	PMO	0218171823	USD 700	Antoinette Fuller	--	Samuel Birch	36176008	N	N
10/05/2001	086121234567	CLR	PMO	0218200136	USD 700	Nicola Reid	--	Samuel Birch	36176008	N	N
10/05/2001	086121234567	CLR	PMO	0218200137	USD 700	Nicola Reid	--	Samuel Birch	36176008	N	N
10/05/2001	086121234567	CLR	PMO	0218200138	USD 700	Erica Robinson	--	Samuel Birch	36176008	N	N
10/05/2001	086121234567	CLR	PMO	0218200139	USD 700	John Washington	--	Samuel Birch	36176008	N	N
10/05/2001	086121234567	CLR	PMO	8528804606	USD 700	John Washington	--	Samuel Birch	36176008	N	N
10/05/2001	086121234567	CLR	PMO	R52PRR14517	USD 700	John Washington	--	Samuel Birch	36176008	N	N

FIG. 17

Mantas - Alert Details - Microsoft Internet Explorer

File Edit View Favorites Tools Help

Address

Go Links

Transactions

Date	Type	Amount	Number	Remitter	Remitter Address
07/31/00	Monetary Instruments	\$100,000	100	Helen	

Alert History

2 of 2 Displayed

Date	Action	By	Alert ID	Scenario	Highlights
03/31/00	Closed - case opened	L. Martinez	3018	Hidden Relationship	Recurring Remitter, MI 101, \$101,000
01/31/00	Closed	M. Murphy	2867	Hidden Relationship	Recurring Remitter, MI 200, \$200,000

Previous SARS Filed

Date Filed	SAR Database Reference Number	Compliance Manager	Law Enforcement Notified	Agency Notified
04/24/00	SAR 4356	M. Humphry	No	

Done

Overview Alerts Query Reports Preferences Logout

My Computer

1800

1804

1808

FIG. 18

[illegible]

**FIG. 19**

AML Reports										Kiosk Alerts Inquiry Reports Preferences Logout												
Alert Disposition										Overview Workload Management Alert Disposition												
Select an Organization or User and a Scenario Class or specific Scenario for the report.																						
Filter by:		Organization:			or Owner:			Alerts created between			and			Scenario Class:			or Scenario:			Score >=		
								[04/16/2001]			[04/20/2001]			All			All			[25]		
<div> <div>Help</div> <div>Print Preview</div> </div>																						
Alert Disposition Report										<div> <div>Help</div> <div>Print Preview</div> </div>												
Report Date: 04/20/01					Date Range: 04/16/01 - 04/20/01					Below System Pending					Generated Threshold Autoclosed Autoclose							
Report Time: 14:32					Score: >= 25					Totals					1350 300 280 20							
Subject: All																						
Scenario Class: All										Closing Details												
Organization	Owner	Available	Not Closed	Closed	AWH	IAE	CO	DUP	CTR	TTC	CS3	CS6	CSY	SAR								
IA Pool	user 1	380	0	95	40	20	0	20	25	20	10	85	130	130								
	user 2	0	0	160	10	5	0	5	10	0	5	25	35	35								
	user 3	0	0	95	20	10	0	10	10	0	0	40	70	70								
	IA Pool	30	0	95	10	5	0	5	5	20	5	20	25	25								
Fraud	user 1	460	10	150	100	0	10	60	0	40	40	100	100	100								
	user 2	7	109	3	4	0	5	0	0	10	0	40	50	50								
	user 3	3	341	0	96	0	5	60	0	30	40	60	50	50								
Money Laundering	user 1	210	10	200	50	30	20	10	10	10	15	15	40	40								
	user 2	7	100	7	25	15	10	5	5	5	7	8	20	20								
	user 3	3	100	3	25	15	10	5	5	5	8	7	20	20								
Total		1050	50	1000	190	50	30	90	35	70	65	200	270	270								
Closing Reasons										TTC Transfer												
AWH	Action Withheld	CS3 Close and Suppress 3 months																				
IAE	Invalid Alert - System Error	CS6 Close and Suppress 6 months																				
CO	Case Opened	CSY Close and Suppress 1 year																				
DUP	Duplicate	SAR Suspicious Activity Report Filed																				
CTR	CTR Filed																					

FIG. 20

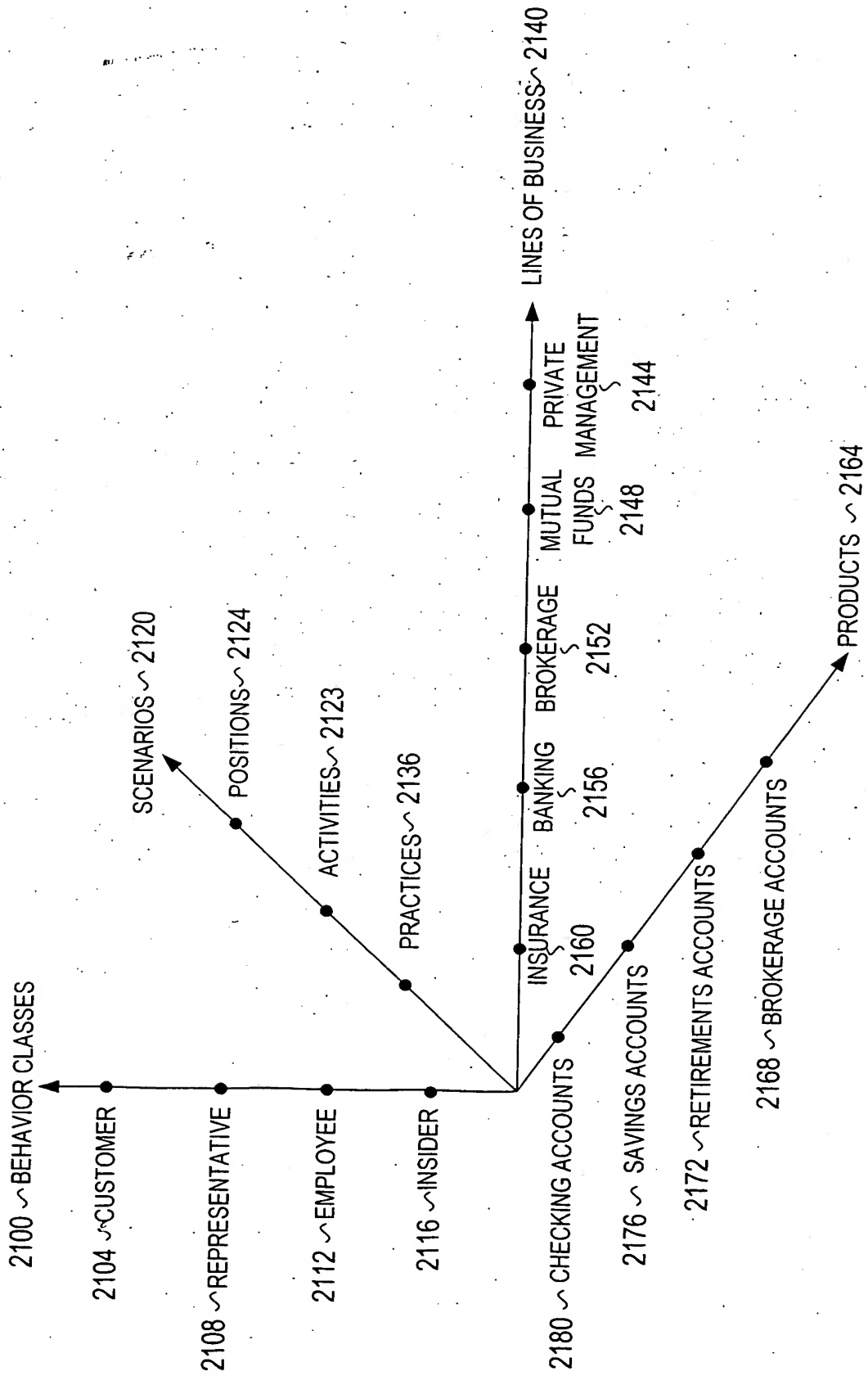


FIG. 21

Parameter	Description	Default	Min	Max
Conc Posn MVL	The minimum amount that must be concentrated in a single equity security to receive an alert.	\$400K	\$75K	\$10M
Conc %	The percentage portfolio concentration in a single security required to receive an alert. This figure is computed by comparing market value of the holdings in the concentrated security to the total cash and security value.	80%	40%	100%
Equity %	The equity percentage at or below which an account can be considered for an alert.	40%	0%	90%
Accts on Margin	For household-level alerts, the minimum number of accounts in the household that must be trading on margin (i.e., have an equity percentage less than 100) and be concentrated in the same security as the household in order to receive an alert.	2	2	10
% Change	The percent change in the direction of interest that must occur for a situation to be considered significantly different from the previous month. If this occurs, an alert will be generated even if the account/household met the criteria during the previous month.	15%	0%	100%

Parameter	Description	Default	Min	Max
Low-Pr Sec MVL	The minimum aggregate market value in low-priced equities required to receive an alert.	\$400K	\$75K	\$10M
Low-Pr Sec Conc %	The percentage portfolio concentration in low-priced equities required to receive an alert. This figure is computed by comparing low-priced security MVL to the total cash and security value.	80%	10%	100%
% Change	The percent change in the direction of interest that must occur for a situation to be considered significantly different from the previous month. If this occurs, an alert will be generated even if the account/household met the criteria during the previous month.	15%	0%	100%



Parameter	Description	Default	Min	Max
Equity Share Qty	The quantity threshold below which an equity order may be handled by an auto-execution system. To qualify for an alert, each order in a series must be for less than this threshold, and the cumulative quantity must be for more than this threshold.	2,001	2	100,000
Equity Time Limit	The total time span (in seconds) within which a series of equity orders must be entered to qualify for an alert.	30	2	18,000
Option Contract Qty	The quantity threshold below which an option order may be handled by an auto-execution system. To qualify for an alert, each order in a series must be for less than this threshold, and the cumulative quantity must be for more than this threshold.	21	2	10,000
Option Time Limit	The total time span (in seconds) within which a series of option orders must be entered to qualify for an alert.	15	2	18,000

Parameter	Description	Default	Min	Max
Min Before Mkt Close	The period of time (in minutes) before the end of regular trading hours in which an order may be considered for a Marking the Close alert.	2	1	6
Posn / Trd Qty Ratio	The minimum position—expressed as a multiple of the end-of-market trade quantity—that must be held in a margin (type 2 or 6) account to be considered a possible situation of interest.	20	2	1,000
% Pts Over Mgn Maint	For the account with a substantial position in the security of interest, the maximum number of percentage points by which the account's ending equity percentage may exceed its maintenance requirement (normally 35%).	5%	1%	40%

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Parameter	Description	Default	Min	Max
Improper Short Trd #	The number of improper short sales an account must make over the course of one month to qualify for an alert.	3	1	100

Parameter	Description	Default	Min	Max
Change from Market %	The percentage factor by which a possible extended-hours cross-trade in a security must deviate from both the recent closing price and the previous execution price for the security.	15%	1%	1,000%
Mkt Moving Trend #	The number of ensuing executions in the same price range as the cross-trade (or further away from the recent closing price) that will be interpreted as a market-moving trend. If such a trend occurs, an alert will not be generated on the cross-trade.	3	1	10,000
Similar Range %	The percent range around the cross-trade price within which ensuing trades will be considered "similarly priced." This is used to evaluate market trends—if enough trades have a similar price or are further from the closing price, a trend has occurred.	5	0	100

FIG. 27

Parameter	Description	Default	Min	Max
Act vs Exp Ratio	For a representative's activity in a particular security, the ratio of the actual versus expected number of unsolicited orders necessary to qualify for an alert.	4	2	100
Side of Market %	For a representative's activity in a particular security, the percentage of the customer orders that must be on one side of the market (either Buy or Sell) in order to qualify for an alert.	75%	60%	100%
Min Ords - Svc Tm	For representatives working in call centers or on service teams, the minimum number of orders that must be entered on one side of the market for a particular security in order to be considered for an alert.	20	4	100
Min Ords - Br Rep	For representatives working in branch offices, the minimum number of orders that must be entered on one side of the market for a particular security in order to be considered for an alert.	8	4	100
Min Accts - Svc Tm	For representatives working in call centers or on service teams, the minimum number of distinct customer accounts from which the representative must receive orders for a particular security in order to be considered for an alert.	10	1	100
Min Accts - Br Rep	For representatives working in branch offices, the minimum number of distinct customer accounts from which the representative must receive orders for a particular security in order to be considered for an alert.	4	1	100
Solicited Trades	The number of solicited orders that a representative must enter for a particular account to be considered a possible situation of interest. The representative must meet the criteria for solicited and unsolicited orders within the prescribed timeframe.	2	1	50
Unsolicited Trades	The number of unsolicited orders that a representative must enter for a particular account to be considered a possible situation of interest. The representative must meet the criteria for solicited and unsolicited orders within the prescribed timeframe.	2	1	50
Total Days	The total time span (in days) within which the representative must enter the solicited and unsolicited orders for a particular customer.	1	1	14

Parameter	Description	Default	Min	Max
Hrs b/t Trades	The maximum amount of time that may transpire between an employee entering a customer order and the employee placing a similar trade in his/her account. The time is expressed in market hours (i.e., 6.5 hours equals one business day).	13	0.1	13
Cust Eqty Shr Qt	The share quantity at or above which a customer's equity order can be considered for a shadowing alert. The customer trade must meet the minimum threshold in terms of share quantity or principal amount.	100	0	1M
Cust Eqty Prin Amt	The principal amount at or above which a customer's equity order can be considered for a shadowing alert. The customer trade must meet the minimum threshold in terms of share quantity or principal amount.	\$2K	\$0	\$10M
Cust Optn Cntr Qt	The contract quantity at or above which a customer's option order can be considered for a shadowing alert. The customer trade must meet the minimum threshold in terms of quantity or principal amount.	0	0	10,000
Cust Optn Prin Amt	The principal amount at or above which a customer's option order can be considered for a shadowing alert. The customer trade must meet the minimum threshold in terms of quantity or principal amount.	\$0	\$0	\$1M
Emp Eqty Shr Qt	The share quantity at or above which an employee's equity order can be considered for a shadowing alert. The employee trade must meet the minimum threshold in terms of share quantity or principal amount.	100	0	1M
Emp Eqty Prin Amt	The principal amount at or above which an employee's equity order can be considered for a shadowing alert. The employee trade must meet the minimum threshold in terms of share quantity or principal amount.	\$2K	\$0	\$10M
Emp Optn Cntr Qt	The contract quantity at or above which an employee's option order can be considered for a shadowing alert. The employee trade must meet the minimum threshold in terms of quantity or principal amount.	0	0	10,000
Emp Optn Prin Amt	The principal amount at or above which an employee's option order can be considered for a shadowing alert. The employee trade must meet the minimum threshold in terms of quantity or principal amount.	\$0	\$0	\$1M
Hrs b/t Trades - CC	The maximum amount of time between a control customer trade (involving the security in which he/she has a controlling role) and an employee order for a similar security. The time is expressed in market hours (i.e., 6.5 hours equals one business day).	13	0.1	13

Continued on 29B

Continued from 29A

⋮

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Parameter	Description	Default	Min	Max
Ctrl Cust Eq Shr Qt	The minimum share quantity required for a control customer's order (involving the security in which he/she has a controlling role) to be considered a candidate for a shadowing alert. The trade can also qualify if it meets the Prin threshold.	5000	0	1M
Ctrl Cust Eq Prin	The minimum principal amount required for a control customer's order (involving the security in which he/she has a controlling role) to be considered a candidate for a shadowing alert. The trade can also qualify if it meets the Shr Qt threshold.	\$100K	\$0	\$10M
Ctrl Cust Op Cntr Qt	The minimum contract quantity required for a control customer's option order (involving the security in which he/she has a controlling role) to be considered a candidate for a shadowing alert. The trade can also qualify if it meets the Prin threshold.	50	0	10,000
Ctrl Cust Op Prin	The minimum principal amount required for a control customer's option order (involving the security in which he/she has a controlling role) to be considered a candidate for a shadowing alert. The trade can also qualify if it meets the Cntr Qt threshold.	\$50K	\$0	\$1M
Emp Eq Shr Qt - CC	For alerts involving the shadowing of a control customer order not entered by the employee, the minimum share quantity required for an employee's equity order to be considered in an alert. The trade can also qualify if it meets the Prin threshold.	100	0	1M
Emp Eq Prin - CC	For alerts involving the shadowing of a control customer order not entered by the employee, the principal amount required for an employee's equity order to be considered in an alert. The trade can also qualify if it meets the Shr Qt threshold.	\$2K	\$0	\$10M
Emp Op Cntr Qt - CC	For alerts involving the shadowing of a control customer order not entered by the employee, the minimum contract quantity required for an employee's option order to be considered in an alert. The trade can also qualify if it meets the Prin Amt threshold.	0	0	10,000
Emp Op Prin - CC	For alerts involving the shadowing of a control customer order not entered by the employee, the principal amount required for an employee's option order to be considered in an alert. The trade can also qualify if it meets the Cntr Qt threshold.	\$0	\$0	\$1M

Parameter	Description	Default	Min	Max
Seconds b/t Orders	The maximum amount of time that may transpire between an employee placing a trade in his/her account and the employee entering a customer or firm account order for a similar security. The time is expressed in seconds. The orders must occur during the same business day.	900	1	23,400
Cust Eq Ord Shr Qty	The share quantity at or above which a customer or proprietary account equity order may be considered a candidate for front-running.	500	0	1,000,000
Cust Op Ord Cntr Qty	The contract quantity at or above which a customer or proprietary account option order may be considered a candidate for front-running.	5	0	100,000
Cust Bd Ord Prin Amt	The principal amount at or above which a customer or proprietary account bond order may be considered a candidate for front-running.	\$25K	\$0	\$10M
Cust Ot Ord Prin Amt	The principal amount at or above which a customer or proprietary account order for an "other" security type (i.e., one that is not classified as an equity, option, bond, mutual fund, money market, or CD) may be considered a candidate for front-running.	\$25K	\$0	\$10M
Emp Eq Ord Shr Qty	The share quantity at or above which an employee's equity order may be considered in a front-running alert.	100	0	1,000,000
Emp Op Ord Cntr Qty	The contract quantity at or above which an employee's option order may be considered in a front-running alert.	1	0	100,000
Emp Bd Ord Prin Amt	The principal amount at or above which an employee's bond order may be considered in a front-running alert.	\$5K	\$0	\$10M
Emp Ot Ord Prin Amt	The principal amount at or above which an employee's order for an "other" security type (i.e., one that is not classified as an equity, option, bond, mutual fund, money market, or CD) may be considered in a front-running alert.	\$5K	\$0	\$10M

FIG. 30



Parameter	Description	Default	Min	Max
Time Ahead Large Ord	The amount of time (in seconds) within which an employee's order must precede a large order to be considered a possible situation of interest.	360	1	3,600
Time After Large Ord	The amount of time (in seconds) following a large order within which an employee must place a trade opposite to the one he/she made ahead of the large order. All orders involved in the possible front-running situation must take place on the same business day.	7,200	1	2,400
Employee Profit	The net profit that the employee must realize from the trades surrounding the large order.	\$100	(\$10K)	\$10K
Low Vol Eq Shr Qty	For non-heavily-traded equities, the share quantity at or above which an order is considered large enough to be a candidate for front-running. The order must meet the minimum threshold in terms of either share quantity or principal amount.	5,000	2,500	1,000,000
Low Vol Eq Prin Amt	For non-heavily-traded equities, the principal amount at or above which an order is considered large enough to be a candidate for front-running. The order must meet the minimum threshold in terms of either share quantity or principal amount.	\$50K	\$25K	\$10M
High Vol Eq Shr Qty	For heavily traded equities, the share quantity at or above which an order is considered large enough to be a candidate for front-running. The order must meet the minimum threshold in terms of either share quantity or principal amount.	25,000	2,500	1,000,000
High Vol Eq Prin Amt	For heavily traded equities, the principal amount at or above which an order is considered large enough to be a candidate for front-running. The order must meet the minimum threshold in terms of either share quantity or principal amount.	\$250K	\$25K	\$10M
Option Contract Qty	The contract quantity at or above which an option order is considered large enough to be a candidate for front-running.	5	1	100,000
Bond Prin Amt	The principal amount at or above which a bond order is considered large enough to be a candidate for front-running.	\$50K	\$25K	\$10M

FIG. 31

Parameter	Description	Default	Min	Max
% Security Pr Change	The percentage change relative to the previous day's close that must be observed for a security to be a candidate for an insider trading alert.	15%	10%	1,000%
% Pr Mvmt Attained	The percentage of the price differential—computed by comparing the current closing price to the previous day's closing price—that an employee must manage to attain to be considered for an insider trading alert.	50%	100%	0%

Parameter	Description	Default	Min	Max
% Orig Sec Sold	For the mutual fund(s) the customer switched out of, the percentage of the buys during the past 6 months that were sold as part of the switch trade(s).	25%	1%	100%

Parameter	Description	Default	Min	Max
Hot IPO Defn - \$ Chg	The absolute price increase— measured from the initial trading price to the closing price—at or above which an IPO will be considered “hot.” An IPO can qualify as “hot” by meeting the absolute or percentage threshold.	\$2	\$0	\$100
Hot IPO Defn - % Chg	The percentage price increase— measured from the initial trading price to the closing price—at or above which an IPO will be considered “hot.” An IPO can qualify as “hot” by meeting the absolute or percentage threshold.	10%	1%	1,000%
% Alloc to Sub - Abs	The percentage allotment of IPO shares to a single subaccount that will automatically be considered disproportionate, regardless of how the subaccount’s allocation compares to its expected allotment.	25%	1%	100%
% Alloc to Sub - Min	The percentage allotment of IPO shares to a single subaccount that may be considered disproportionate, if the subaccount’s allocation also exceeds its expected allotment by more than a specified ratio.	10%	1%	100%
Ratio Act vs Exp Qty	The allocation of IPO shares to a subaccount—measured as a multiple of its expected allotment—that may be considered disproportionate, if the percentage of shares allocated to the subaccount also exceeds a minimum parameter. The expected allocation is based on the size of the subaccount relative to the total assets managed by the IA.	5	1	100

FIG. 34

Parameter	Description	Default	Min	Max
# Fav/Unfav Day Trds	The minimum number of “winning” or “losing” day-trade block allocations (i.e., the concurrent allotment of a buy and a sell) that a subaccount must receive over the course of a month to establish a pattern of favorable or unfavorable treatment by the IA.	4	1	100
% Day Trds Same Side	The percentage of the “winning” or “losing” day-trade block trade allocations that must have the end result (i.e., must be favorable or unfavorable) for the subaccount involved to establish a pattern of unequal treatment by the IA.	80%	50%	100%
Net P&L Day Trds - \$	The minimum net amount a subaccount must gain or lose as a result of day-trade block trade allocations to be considered for an alert.	\$1K	\$1	\$1M
Ratio Act/Exp DT P&L	The level of gains or losses from block day-trades for a subaccount—measured as a multiple of its expected gain/loss—that may be of interest. The expected P&L is based on the size of the subaccount relative to the total assets managed by the IA.	4	0	100
# Fav/Unfav Trds	The minimum number of “winning” or “losing” block trade allocations that a subaccount must receive over the course of a month to establish a pattern of favorable or unfavorable treatment by the IA.	8	1	100
% Trds Same Side	The percentage of the “winning” or “losing” block trade allocations that must have the end result (i.e., must be favorable or unfavorable) for the subaccount involved to establish a pattern of unequal treatment by the IA.	80%	50%	100%
Net P&L Trds - \$	The minimum net amount a subaccount must gain or lose as a result of block trade allocations to be considered for an alert.	\$1K	\$1	\$1M
Ratio Act/Exp P&L	The level of gains or losses from block trades for a subaccount—measured as a multiple of its expected gain/loss—that may be of interest. The expected P&L is based on the size of the subaccount relative to the total assets managed by the IA.	4	0	100

FIG. 35

Parameter	Description	Default	Min	Max
% Conc Level	The percentage of assets that must be held in a single equity position for an account to be classified as "concentrated."	50%	1%	100%
% Subs w/Conc Posns	The percentage of IA subaccounts that must have a concentrated position to create an IA-level alert.	50%	1%	100%
# HHs w/Conc Posns	The number of distinct household-security combinations (among the subaccounts for an IA) that must have a concentrated position to create an IA-level alert.	5	1	1,000